

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jonathan Tasini, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

AOL Inc., TheHuffintonPost.Com, Inc.,
Arianna Huffington and Kenneth Lerer

Defendants.

ECF CASE

CIVIL ACTION: 11 CV 2472

APPLICATION FOR CERTIFICATE OF DEFAULT BY THE CLERK

Plaintiff Jonathan Tasini, individually and on behalf of all others similarly situated, by their attorney Jeffrey Mead Kurzon of Kurzon Strauss LLP, respectfully request the Clerk to enter a default under Rule 55(a) of the Federal Rules of Civil Procedure and Local Rule 55.1 against Defendant AOL Inc. on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure. The attached Affidavit of Jeffrey Mead Kurzon shows that 1) AOL Inc. is not an infant, in the military, or an incompetent person; 2) that AOL Inc. has failed to plead or otherwise defend this action; and 3) the Complaint to which no response has been made was properly served.

[Signature page follows]

Dated: New York, New York
May 4, 2011

Respectfully Submitted,



By: _____
Jeffrey Mead Kurzon, Esq.
Bar No. JM3388
Jeff@KurzonStrauss.com

KURZON STRAUSS LLP
305 Broadway, 9 FL
New York, NY 10007
Phone: 212-822-14
www.KurzonStrauss.com
Attorneys for Plaintiff and the Classes